The Honorable John C. Coughenour 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 Civil Action No. 2:22-cv-01373-JCC SIXTY-01 ASSOCIATION OF APARTMENT OWNERS, a Washington 10 non-profit corporation,, STIPULATION REQUESTING 11 Plaintiff, **EXTENSION OF DISCOVERY CUTOFF** AND RELATED DEADLINES and 12 PROPOSED ORDER v. 13 PUBLIC SERVICE INSURANCE COMPANY; GREAT LAKES INSURANCE, SE; ASPEN SPECIALTY 14 INSURANCE COMPANY: IRONSHORE SPECIALTY INSURANCE COMPANY; 15 LIBERTY SURPLUS INSURANCE 16 COMPANY; ALTERRA EXCESS & SURPLUS INSURANCE COMPANY; INDIAN HARBOR INSURANCE 17 COMPANY; STARR SURPLUS LINES 18 INSURANCE COMPANY; HOMELAND INSURANCE COMPANY OF NEW 19 YORK; CERTAIN UNDERWRITERS AT LLOYD'S, LONDON (BRIT SYNDICATE 20 2987); and ARCH SPECIALTY INSURANCE COMPANY, 21 Defendants. 22 23 24 25 26 27 Stipulation Requesting Extension of Discovery Cutoff McCormick Barstow, LLP

Scripps Center, Suite 1050

312 Walnut Street Cincinnati, Ohio 45202 (513) 62-7520

and Related Deadlines

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(No. 2:22-cv-01373 JCC)

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I. <u>STIPULATION</u>

Defendant Public Service Insurance Company ("PSIC") and Plaintiff Sixty-01 Association of Apartment Owners ("Association") have conferred regarding the discovery deadlines previously stipulated to (Dkt. #166), and as amended by the Court on December 8, 2023 (Dkt. #167). In light of the current stay and lack of a trial date, the parties are in agreement that it is in the best interest of both parties to extend all current discovery deadlines by sixty (60) days. Accordingly, the parties propose and agree to amend the deadlines, as follows:

<u>Date</u>	Event
May 14, 2024	Last day to disclose expert witnesses
June 4, 2024	Last day to submit expert disclosure rebuttals
June 24, 2024	Deadline to file discovery-related motions
June 24, 2024	Discovery cutoff

DATED: March 12, 2024

Ashbaugh Beal

By:/s/ Jesse D. Miller

McCORMICK BARSTOW LLP

By: /s/ Patrick Fredette

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Stipulation Requesting Extension of Discovery Cutoff and Related Deadlines (No. 2:22-cv-01373 JCC)

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1 II. **ORDER** Having considered the stipulation and facts therein, the Court hereby grants the stipulated 2 3 extension of all pending discovery deadlines. IT IS SO ORDERED 4 5 DATED this 13th day of March, 2024. 6 John C Coylina 7 8 JUDGE JOHN C. COUGHENOUR United States Distrct Judge 9 10 11 Presented by: 12 13 14 ASHBAUGH BEAL McCORMICK BARSTOW LLP 15 By:/s/ Jesse D. Miller By: <u>/s/ Patrick Fredette</u> Patrick Fredette, WSBA #25300 Jesse D. Miller, WSBA #35837 16 imiller@ashbaughbeal.com patrick.fredette@mccormickbarstow.com Zachary O. McIsaac, WSBA #35833 Kevin D. Hansen, pro hac vice 17 zmcisaac@ashbaughbeal.com kevin.hansen@mccormickbarstow.com Attorneys for Plaintiff Maria E. Valencia, pro hac vice 18 maria.valencia@mccormickbarstow.com 701 Fifth Avenue, Suite 4400 Nicholas H. Rasmussen, pro hac vice 19 Seattle, WA 98104 nicholas.rasmussen@mccormickbarstow.com 20 Attorneys for Defendant Public Service Insurance Company 21 Scripps Center, Suite 1050 22 312 Walnut Street Cincinnati, Ohio 45202 23 24 9741194.1 25 26 27 Stipulation Requesting Extension of Discovery Cutoff McCormick Barstow, LLP and Related Deadlines

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PROOF OF SERVICE

Sixty-01 Association of Apartment Owners v. Public Service Ins. Co. Case No. 22-cv-01373-JCC

STATE OF CALIFORNIA, COUNTY OF FRESNO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Fresno, State of California. My business address is 7647 North Fresno Street, Fresno, CA 93720.

On March 12, 2024, I served true copies of the following document(s) described as STIPULATION REQUESTING EXTENSION OF DISCOVERY CUTOFF AND RELATED DEADLINES and PROPOSED ORDER on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 12, 2024, at Fresno, California.

Heather Ward

Stipulation Requesting Extension of Discovery Cutoff and Related Deadlines (No. 2:22-cv-01373 JCC)

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